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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CELLINK CORP.

Plaintiff,

vs.

MANAFLEX LLC,

Defendant.

CASE NO. 4:23-cv-04231-HSG

**STIPULATION REGARDING  
EXTENSION OF TIME TO RESPOND  
TO FIRST AMENDED COMPLAINT ;  
ORDER**

**[Civil L.R. 6-1, 6-2]**

Demand for Jury Trial

Complaint Filed: August 18, 2023

FAC Filed: November 22, 2024

1 Pursuant to Local Civil Rules 6-1 and 6-2, Plaintiff CelLink Corporation (“CelLink”) and  
2 Defendant Manaflex LLC (“Manaflex”) stipulate to extend Manaflex’s deadline for its response to  
3 the First Amended Complaint.

4 WHEREAS, on November 19, 2024, CelLink’s Motion for Leave to File Amended  
5 Complaint was granted by this Court;

6 WHEREAS, CelLink’s First Amended Complaint was filed and served on  
7 November 22, 2024;

8 WHEREAS, the filing of CelLink’s First Amended Complaint, ECF 106, previously  
9 caused the Court to issue an Order to Show Cause, ECF 110, regarding CelLink’s then pending  
10 Motion to Dismiss Manaflex’s Unfair Competition Counterclaim, ECF 74, as moot;

11 WHEREAS, CelLink’s Motion to Dismiss Manaflex’s Unfair Competition Counterclaim  
12 was withdrawn as moot on December 2, 2024, ECF 111;

13 WHEREAS, Manaflex filed its Motion to Dismiss CelLink’s First Amended Complaint on  
14 January 8, 2025;

15 WHEREAS, the Court granted the Manaflex Motion to Dismiss on April 9, 2025 striking  
16 Count VI against Messrs. Lane and Barton and Counts VII–IX against Manaflex with leave to  
17 amend by April 30, 2025;

18 WHEREAS, Manaflex’s response to the remaining counts of the First Amended Complaint  
19 is due by April 23, 2025;

20 WHEREAS, the parties are engaged in meet and confer efforts to efficiently determine  
21 whether CelLink will file an amended complaint on April 30, 2025 that would render any  
22 Manaflex response filed on April 23, 2025 moot;

23 WHEREAS, it is in the interest of efficiency for all parties and the Court to avoid  
24 duplicative and unnecessary responsive filings. Anderson Decl. ¶ 5.

25 WHEREAS, there have been eight previous extensions of time in this case:

26 (1) a stipulated extension of time to respond to the complaint that was filed on  
27 September 11, 2023 and granted on September 12, 2023. Anderson Decl. ¶ 6.

1 (2) a stipulated extension of time for the Parties to file a Joint Case Management Statement  
2 and selecting an ADR process that was filed on November 7, 2023 and granted on  
3 November 8, 2023. *Id.*

4 (3) a stipulated extension of time to respond to counterclaims that was filed on  
5 November 27, 2023 and granted on November 28, 2023. *Id.*

6 (4) a stipulated extension of time to respond to counterclaims that was filed on  
7 June 12, 2024 and granted on June 12, 2024. *Id.*

8 (5) a stipulated request for an order modifying the Parties' briefing schedule related to  
9 Plaintiff's motion to dismiss Defendant's unfair competition counterclaim filed on July 17, 2024  
10 and granted on July 18, 2024. *Id.*

11 (6) a stipulated request for an order modifying hearing schedule related to Cellink's  
12 Motion to File the First Amended Complaint filed on October 14, 2024 and granted on  
13 October 15, 2024. *Id.*

14 (7) a stipulated extension of time to respond to the first amended complaint that was filed  
15 on December 4, 2024 and granted on December 5, 2024. *Id.*

16 (8) a stipulated extension of time to respond to the first amended complaint that was filed  
17 on December 16, 2024 and granted on December 17, 2024. *Id.*

18 WHEREAS, the brief extension of time requested here would have no effect on any other  
19 scheduled deadlines for the case. Anderson Decl. ¶ 7.

20 WHEREAS, other than as set forth below, the parties agree that all other deadlines will  
21 remain in place.

22 **NOW THEREFORE**, subject to the Court's approval, it is hereby stipulated and agreed  
23 between Cellink and Manaflex, through their undersigned counsel, as follows:

24 1. Defendant Manaflex's time to file any response to the remaining Counts I, II, and III of  
25 the First Amended Complaint shall be extended to April 30, 2024.

26 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

1 Dated: April 22, 2025

BOIES SCHILLER FLEXNER LLP

2 /s/ Alison L. Anderson

3 Alison L. Anderson

4 Eric J. Maurer

Beko Reblitz-Richardson

5 *Attorneys for Defendant Manaflex LLC*

6 Dated: April 22, 2025

7 /s/ Andrea Levenson

HAYNES BOONE

8 Jason Lao

9 Brian Kwok

Ken Parker

Andrea Levenson

10 *Attorneys for Plaintiff CelLink Corp.*

**ECF ATTESTATION**


I, Alison L. Anderson, am the ECF User whose ID and password are being used to file this Stipulation Regarding Extension of Time to Respond to Plaintiff's First Amended Complaint and [Proposed] Order. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Andrea Levenson, counsel for CelLink Corp., has concurred in this filing.

Dated: April 22, 2025

/s/ Alison L. Anderson  
Alison L. Anderson

**PURSUANT TO STIPULATION, IT IS SO ORDERED:**

Dated: 4/23/2025

  
The Honorable Haywood S. Gilliam, Jr.  
United States District Judge